

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider whether certain materials should be sealed. Plaintiffs file these materials under seal out of an abundance of caution because they contain references to documents produced and marked confidential by Uber.

Material To Be Filed Under Seal

The materials to be filed under seal are portions of Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order and exhibits attached thereto. Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Portions of Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	References to information deemed confidential	Uber
Portions of Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	References to information deemed confidential	Uber
Exhibit 1 to Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	Document and information deemed confidential	Uber
Exhibit 2 to Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	Document and information deemed confidential	Uber
Exhibit 3 to Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	Document and information deemed confidential	Uber
Exhibit 4 to Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	Document and information deemed confidential	Uber
Exhibit 5 to Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	Document and information deemed confidential	Uber
Exhibit 6 to Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	Document and information deemed confidential	Uber
Exhibit 7 to Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	Document and information deemed confidential	Uber
Exhibit 8 to Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants'	Document and information deemed confidential	Uber

1	Motion for Protective Order		
2	Exhibit 9 to Dec. of R.	Document and information	Uber
3	Luhana ISO Plaintiffs' Brief	deemed confidential	
4	in Opposition to Defendants'		
5	Motion for Protective Order	Document and information	Uber
6	Exhibit 10 to Dec. of R.	deemed confidential	
7	Luhana ISO Plaintiffs' Brief		
8	in Opposition to Defendants'	Document and information	Uber
9	Motion for Protective Order	deemed confidential	
10	Exhibit 11 to Dec. of R.		
11	Luhana ISO Plaintiffs' Brief	Document and information	Uber
12	in Opposition to Defendants'	deemed confidential	
13	Motion for Protective Order		
14	Exhibit 12 to Dec. of R.	Document and information	Uber
15	Luhana ISO Plaintiffs' Brief	deemed confidential	
16	in Opposition to Defendants'		
17	Motion for Protective Order	Document and information	Uber
18	Exhibit 13 to Dec. of R.	deemed confidential	
19	Luhana ISO Plaintiffs' Brief		
20	in Opposition to Defendants'	Document and information	Uber
21	Motion for Protective Order	deemed confidential	
22	Exhibit 14 to Dec. of R.		
23	Luhana ISO Plaintiffs' Brief	Document and information	Uber
24	in Opposition to Defendants'	deemed confidential	
25	Motion for Protective Order		
26	Exhibit 15 to Dec. of R.	Document and information	Uber
27	Luhana ISO Plaintiffs' Brief	deemed confidential	
28	in Opposition to Defendants'		
	Motion for Protective Order	Document and information	Uber
	Exhibit 16 to Dec. of R.	deemed confidential	
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	Motion for Protective Order	deemed confidential	
	Exhibit 17 to Dec. of R.		
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	in Opposition to Defendants'	deemed confidential	
	Motion for Protective Order		
	Exhibit 18 to Dec. of R.	Document and information	Uber
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	Motion for Protective Order		

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Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must "file a statement and/or declaration as described in subsection (c)(1)" of the Local Rules. None of the information at issue was marked confidential by Plaintiffs. Pursuant to the Court's order at Dkt. 1559, Uber must file its statement within one day.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Roopal P. Luhana in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: March 14, 2025

Respectfully submitted,

By: /s/ Roopal P. Luhana

Roopal P. Luhana

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Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 14, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to registered parties.

/s/Roopal Luhana